

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

GABRIEL OJEDA, on behalf of himself and  
all other plaintiffs similarly situated,  
*Plaintiffs,*

v.

J&C OF GENEVA CORPORATION, d/b/a  
Old Towne Pub & Eatery, and Christopher  
Cellini,

*Defendants.*

No. 1:17-cv-928

Judge M. David Weisman

**JOINT STIPULATION FOR VOLUNTARY DISMISSAL**

This Joint Stipulation for Voluntary Dismissal is respectfully submitted by Plaintiff Gabriel Ojeda (hereafter “Plaintiff”), and Defendants J & C of Geneva Corporation d/b/a Old Towne Pub & Eatery and Christopher Cellini, individually (hereafter “Defendants”) pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). The Parties stipulate as follows:

1. On June 20, 2017, the Parties reached a settlement resolving all of the claims in this matter.
2. The settlement reached by the Parties calls for Defendants to make a series of installment payments, with the first installment payment on or before July 5, 2017, and the final installment payment due on December 5, 2019. Pursuant to the agreement, if Defendants default on payment, the Defendants consent to a judgment being entered against each of them, joint and severally, for the entire remaining balance due.
3. The Parties hereby stipulate that this matter, including all counts in the Complaint, shall be dismissed in its entirety with prejudice, with each Party bearing its own attorneys’ fees and costs, except as may be otherwise provided in the Parties’ settlement agreement. The Court shall retain jurisdiction over the enforcement of the terms of the agreement.

/s/ John Kunze

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